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April 10, 2015

IOWA CITIZENS FOR COMMUNITY IMPROVEMENT ACTION FUND 2001 FOREST AVENUE DES MOINES, IA 50311

Response Due Date 05/15/2015

IDENTIFICATION NUMBER: C90013897

REFERENCE: AMENDED YEAR-END REPORT (10/01/2014 - 12/31/2014), RECEIVED

12/03/2014

Dear Filer:

This letter is prompted by the Commission's preliminary review of the Report of Independent Expenditures Made and Contributions Received (FEC Form 5) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. Additional information is needed for the following 2 item(s):

1. It appears that 48-hour notice(s) for the attached independent expenditures was filed late. Please be advised that you are required to file 48-hour reports once you make independent expenditures aggregating \$10,000 or more with respect to a given election any time during the calendar year up to and including the 20th day before the election. The report must be received at the Commission 11:59 p.m. Eastern Standard/Daylight Time by the second day after the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$10,000 or more, you must file another 48-hour report disclosing these independent expenditures. (11 CFR § 109.10(c) and (e)) Please provide clarification regarding the timeliness of your 48-hour reporting for the independent expenditures in question. Further, if the date disclosed on your Form 5 was the date of payment, rather than the date of public dissemination or distribution, please provide the date of dissemination or distribution.

In addition, please be advised that you are required to disclose these independent expenditures, along with contribution and disbursement information, on Form 5 as a regularly scheduled quarterly report. (11 CFR §

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109.10(b) and (e))

**2.** Your quarterly report discloses independent expenditures that do not appear on 48-hour reports (see attached).

Please be advised that Commission Regulations require that you file 48-hour reports once you make independent expenditures aggregating \$10,000 or more with respect to a given election during the calendar year up to and including the 20th day before the election. The report must be received at the Commission 11:59 p.m. Eastern Standard/Daylight Time by the second day after the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$10,000 or more, you must file another 48-hour report disclosing these independent expenditures. (11 CFR § 109.10(c) and (e))

In addition, you are required to file 24-hour reports once your independent expenditures aggregate \$1,000 or more after the 20th day but more than 24 hours before 12:01 a.m. of the day of the election. The report must be received at the Commission by 11:59 p.m. Eastern Standard/Daylight Time of the day following the date on which the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$1,000 or more, you must file another 24-hour report disclosing these independent expenditures. (11 CFR § 109.10(d) and (e))

Please provide clarification regarding whether 24/48-hour reports were required but not filed. If the date disclosed on your Form 5 was the date of payment, rather than the date of public dissemination or distribution, please provide the date of dissemination or distribution.

The Commission notes your original 24-Hour Report, received on 10/17/14 that was amended on 10/29/14. Please be reminded that electronic filers must submit an amended report in its entirety, rather than just those portions of the report that are being amended.

Please note, you will not receive an additional notice from the Commission on this matter. Requests for extensions of time in which to respond will not be considered. Failure to comply with the provisions of the Act may result in an enforcement action

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against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1395.

Sincerely,

Ben Holly

Senior Campaign Finance Analyst

Baymin G. Holly

Reports Analysis Division

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## **Late Filed 48 Hour Reports**

**Iowa Citizens for Community Improvement Action Fund (C90013897)** 

Name	Date	Amount	Purpose	Candidate
Espey, Hugh	10/1/14	\$1,332.40	Canvassing	Bruce Braley
LC Printing	10/1/14	\$11,833.00	Printing Mail Services	Bruce Braley

Missing 48 Hour Reports Iowa Citizens for Community Improvment Action Fund (C90013897)

Name	Date	Amount	Purpose	Candidate
Bromwell, Karla	10/1/14	\$48.79	Canvassing	Staci Appel
Bryan, Katie	10/1/14	\$74.45	Canvassing	Staci Appel
Cano, Madeline	10/1/14	\$257.89	Canvassing	Staci Appel
Carter, Kaija	10/1/14	\$100.75	Canvassing	Staci Appel
Covington, Matthew	10/1/14	\$35.58	Canvassing	Staci Appel
Espey, Hugh	10/1/14	\$487.08	Canvassing	Staci Appel
Fagan, Bridget	10/1/14	\$234.70	Canvassing, Mileage	Staci Appel
Fisher, Carrie	10/1/14	\$1,751.38	Canvassing	Staci Appel
Harmon, Emily	10/1/14	\$210.38	Canvassing	Staci Appel
Janson, Aaron	10/1/14	\$1,560.93	Canvassing	Staci Appel
			Canvassing, Material	
Journey Heinz, Josh	10/1/14	\$2,501.77	Development	Staci Appel
Malachowski, Nathan	10/1/14	\$327.59	Canvassing	Staci Appel
Mason, Adam	10/1/14	\$543.64	Canvassing	Staci Appel
Mazour, Jess	10/1/14	\$268.13	Canvassing	Staci Appel
			Van Subscription for Voter	
NGP Van Inc	10/1/14	\$750.00	Identification	Staci Appel
Patz, Michael	10/1/14	\$1,120.66	Canvassing	Staci Appel
Snyders, Natalie	10/1/14	\$342.57	Canvassing	Staci Appel
Stall, Patrick	10/1/14	\$1,304.37	Canvassing	Staci Appel
US Cellular	10/1/14	\$218.56	Data Plan for Canvassing	Staci Appel
USPS	10/1/14	\$223.04	Postage for Mailing Pledges	Staci Appel
Whelan, Lisa	10/1/14	\$44.00	Canvassing	Staci Appel
Bromwell, Karla	10/1/14	\$48.79	Canvassing	Bruce Braley
Bryan, Katie	10/1/14	\$319.05	Canvassing	Bruce Braley
Cano, Madeline	10/1/14	\$257.89	Canvassing	Bruce Braley
Carter, Kaija	10/1/14	\$100.75	Canvassing	Bruce Braley
Cityview	10/1/14	\$1,785.00	Newspaper Advertising	Bruce Braley
Covington, Matthew	10/1/14	\$840.17	Canvassing, Mileage	Bruce Braley
Daily Iowan	10/1/14	\$5,212.62	Newspaper Advertising	Bruce Braley
Des Moines Register	10/1/14	\$6,623.10	Newspaper Advertising	Bruce Braley
El Enfoque	10/1/14	\$375.00	Newspaper Advertising	Bruce Braley
_			Consulting on Material	
Erickson Agency	10/1/14	\$1,299.00	Development	Bruce Braley

Missing 48 Hour Reports Iowa Citizens for Community Improvment Action Fund (C90013897)

Name	Date	Amount	Purpose	Candidate
Espey, Hugh	10/1/14	\$1,183.75	Canvassing	Bruce Braley
Fagan, Bridget	10/1/14	\$234.70	Canvassing	Bruce Braley
Fisher, Carrie	10/1/14	\$1,751.37	Canvassing	Bruce Braley
Harmon, Emily	10/1/14	\$210.39	Canvassing, Mileage	Bruce Braley
Iowa State Daily	10/1/14	\$3,308.86	Newspaper Advertising	Bruce Braley
Janson, Aaron	10/1/14	\$1,560.91	Canvassing	Bruce Braley
			Canvassing, Material	
Journey Heinz, Josh	10/1/14	\$2,501.77	Development	Bruce Braley
KJMC	10/1/14	\$2,000.00	Radio Advertising	Bruce Braley
L C Printing	10/1/14	\$4,018.98	Material Printing	Bruce Braley
Malachowski, Nathan	10/1/14	\$327.59	Canvassing	Bruce Braley
Mason, Adam	10/1/14	\$831.99	Canvassing, Mileage	Bruce Braley
Mazour, Jess	10/1/14	\$268.13	Canvassing	Bruce Braley
			Van Usage for Voter	
NGP Van Inc	10/1/14	\$2,250.00	Identification	Bruce Braley
Northern Iowan	10/1/14	\$1,762.52	Newspaper Advertising	Bruce Braley
			Newspaper Advertising	
Northern Iowan	10/1/14	\$440.63	(Invoice Received Late)	Bruce Braley
Patz, Michael	10/1/14	\$1,120.67	Canvassing	Bruce Braley
			Canvassing, Advertisement	
Snyders, Natalie	10/1/14	\$631.05	Development	Bruce Braley
Specialty Graphics	10/1/14	\$5,851.23	Mail Services	Bruce Braley
Stall, Patrick	10/1/14	\$1,304.37	Canvassing	Bruce Braley
US Cellular	10/1/14	\$218.59	Data Plan for Canvassing	Bruce Braley
USPS	10/1/14	\$320.96	Postage for Pledge Cards	Bruce Braley
Viento del Tropico	10/1/14	\$250.00	Newspaper Advertising	Bruce Braley
Whelan, Lisa	10/1/14	\$44.00	Canvassing	Bruce Braley